

## REMARKS

Claims 3-4, 18-19 and 27-28 are canceled herein. Claims 1, 5-7, 12, 22, 25 and 29-30 are amended herein. Claims 1-2, 5-17, 20-26 and 29-35 remain pending in the present application.

### Claim Rejections - 35 U.S.C. §102

The present office action states that Claims 1-2 and 4-35 are rejected under 35 U.S.C. § 102(b) as being anticipated by Huang et al. (6151582). Applicant has reviewed the cited reference and respectfully submits that the embodiments of the present invention as recited in Claims 1-2 and 4-35 are not anticipated by Huang et al. for the following reasons.

Regarding Claims 3-4, 18-19 and 27-28, Applicant respectfully states that Claims 3-4, 18-19 and 27-28 are canceled herein. Therefore, the rejection under 35 U.S.C. § 102(b) as being anticipated by Huang et al. with respect to Claims 3-4, 18-19 and 27-28 is moot.

Applicant respectfully submits that currently amended Claims 1, 12 and 25 include the feature "wherein said integrated action plan is an end of product life integrated action plan." Support for the Claimed feature can be found throughout the Specification including page 8 lines 1-31.

Applicant has reviewed Huang et al. and agrees with the Examiner that Huang et al. fails to explicitly teach a system that accounts for end of product life situations.

Therefore, Applicant respectfully states that currently amended Claims 1, 12 and 25 are not anticipated by Huang et al. and as such, Claims 1, 12 and 25 are allowable.

With respect to Claims 2 and 5-11, Applicant respectfully states that Claims 2 and 5-11 depend from the allowable Independent Claim 1 and recite further features of the present claimed invention. With respect to Claims 12-17 and 20-24, Applicant respectfully points out that Claims 12-17 and 20-24 depend from the allowable Independent Claim 12 and recite further features of the present claimed invention. With respect to Claims 26 and 29-35, Applicant respectfully points out that Claims 26 and 29-35 depend from the allowable Independent Claim 25 and recite further features of the present claimed invention. Therefore, Applicant respectfully states that Claims 2, 5-11, 13-17, 20-24, 26 and 29-35 are allowable as pending from allowable base Claims.

#### Rejection under 103(a)

##### Claims 3, 18 and 27

In the Office Action, the Examiner rejected Claim 3 (based on the Office Action, Applicant has also assumed the Examiner also meant to include Claims 18 and 27 and has proceeded accordingly) under 35 USC 103(a) as being unpatentable over Huang et al. Applicant has reviewed the cited reference and respectfully submits that the present invention is not rendered obvious over Huang et al. for the following rationale.

With respect to Claims 3, 18 and 27, Applicant respectfully states that Claims 3, 18 and 27 are canceled herein. Therefore, the rejection under 35 U.S.C. § 103(a) as being unpatentable over Huang et al. is moot.

With respect to currently amended Claims 1, 12 and 25, Applicant respectfully submits that Claims 1, 12 and 25 include the feature “evaluating said end of product life materials planning parameters and said end of product life pricing parameters in conjunction to define said integrated action plan wherein said integrated action plan is an end of product life integrated action plan.” Support for the Claimed feature can be found throughout the Specification including page 8 lines 1-31.

Applicant has reviewed Huang et al. and agrees with the Examiner that Huang et al. fails to explicitly teach a system that accounts for end of product life situations.

However, Applicant disagrees with the Examiner that Huang teaches or renders obvious the Claimed features pertaining to an end of product life integrated action plan.

The Examiner has stated that the Huang system, teaches allowing a user to control the inventory levels of finished products by setting inventory parameters. The parameters can be set to a maximum or minimum inventory level. For a discontinued product, a user would set the finished product inventory levels to a minimum. (emphasis added). However, the Examiner does not provide any teachings of Huang et al. to integrate pricing with the finished product inventory levels.

Applicant respectfully submits that Claims 1, 12 and 25 utilize end of life material planning parameters in conjunction with end of product life pricing parameters to define the integrated action plan. That is, as clearly described in the specification, the materials planning is only one portion of the overall end of life integrated action plan.

The Applicant does not understand Huang et al. to teach or render obvious the integration of both the material planning parameters and pricing parameters to provide an end of life integrated action plan. As clearly described in the specification including page 6 lines 25-40 wherein the feature of integrating the pricing parameters and materials planning parameters is clearly stated.

For this reason, Applicant respectfully states that Claims 1, 12 and 25 are not taught or rendered obvious in view of Huang et al. and that Claims 1, 12 and 25 are allowable.

Furthermore, Applicant respectfully submits that Claims 1, 12 and 25 include the feature “end of product life materials planning parameters.” Support for the Claimed feature can be found throughout the Specification including page 7 lines 14-31.

The Examiner has stated that the Huang system, teaches allowing a user to control the inventory levels of finished products by setting inventory parameters. The parameters can be set to a maximum or minimum inventory level. For a discontinued product, a user would set the finished product inventory levels to a minimum. (emphasis added). However, the Examiner does not point out any teachings of Huang et al. to address end of product life materials planning parameters.

Applicant respectfully points out that the material planning parameters are not defined as finished products as the Examiner has stated, but include all aspects of the product manufacture to include the ability to be able to finish a product.

Moreover, Applicant does not understand Huang et al. to teach or render obvious the claimed feature of end of product life material planning parameters. In the Specification, end of product life materials planning parameters are clearly

defined to include: materials planning parameters that change infrequently, such as parts cost, capacity consumption, and a bill-of-materials structure. Specifically, capacity consumption is a measure of resources, such as labor, machine time, etc., which are consumed during product manufacture.

For this additional reason, Applicant respectfully states that Claims 1, 12 and 25 are not taught or rendered obvious in view of Huang et al. and that Claims 1, 12 and 25 are allowable.

With respect to Claims 2 and 5-11, Applicant respectfully states that Claims 2 and 5-11 depend from the allowable Independent Claim 1 and recite further features of the present claimed invention. With respect to Claims 12-17 and 20-24, Applicant respectfully points out that Claims 12-17 and 20-24 depend from the allowable Independent Claim 12 and recite further features of the present claimed invention. With respect to Claims 26 and 29-35, Applicant respectfully points out that Claims 26 and 29-35 depend from the allowable Independent Claim 25 and recite further features of the present claimed invention. Therefore, Applicant respectfully states that Claims 2, 5-11, 13-17, 20-24, 26 and 29-35 are allowable as pending from allowable base Claims.

## CONCLUSION

Based on the arguments presented above, Applicants respectfully assert that Claims 1-2, 5-17, 20-26 and 29-35 overcome the rejections of record, and therefore, Applicants respectfully solicit allowance of these Claims.

The Examiner is invited to contact Applicants' undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Respectfully submitted,  
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